THE HONORABLE JOHN H. CHUN

**UNITED STATES DISTRICT COURT**
**WESTERN DISTRICT OF WASHINGTON**
**AT SEATTLE**

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

**CASE NO.: 2:23-cv-01495-JHC**

**DECLARATION OF CATHLEEN WILLIAMS IN SUPPORT OF PLAINTIFFS' MOTION TO EXCLUDE DEFENDANT'S REBUTTAL EXPERT CATHERINE BRIEN**

I, Cathleen Williams, declare as follows:

1. I am an Attorney in the Federal Trade Commission's ("FTC") Bureau of Competition, and I represent the FTC in the above-captioned action. I am over eighteen years of age and am competent to testify to the matters set forth in this declaration. I make the following statements based on my personal knowledge.

2. Pursuant to the Court's October 13, 2026 Order (Dkt. #715), the parties have provisionally filed under seal certain exhibits that contain material designated "Highly Confidential—Attorneys' Eyes Only" or "Confidential" under the Protective Order (Dkt. #160).



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3. Consistent with Local Rule 10(e)(10), red boxes have been added to the attachments to indicate excerpts referenced in Plaintiffs' Motion to Exclude Defendant's Rebuttal Expert Catherine Brien.

4. Attached as **Exhibit 1** is a true and correct copy of the Rebuttal Expert Report of Catherine Brien dated June 10, 2026.

5. Attached as **Exhibit 2** is a true and correct copy of excerpts from the deposition transcript of Catherine Brien in this matter dated September 16, 2026.

6. Attached as **Exhibit 3** is a true and correct copy of excerpts from the Expert Reply Report of Andreas Groehn, Ph.D. in this matter dated August 19, 2026.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 16, 2026, in Washington, DC.

*s/ Cathleen Williams*
Cathleen Williams



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